

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

RAPHAEL P. ANGELES

Plaintiff,

vs.

FIRST ADVANTAGE BACKGROUND
SERVICES CORP.

Defendant.

Case Number: 1:22-cv-00244-KLL

Magistrate Judge Karen L. Litkovitz

**JOINT MOTION FOR
EXTENSION OF CASE
SCHEDULE**

This matter comes before the Court upon the parties' motion for a 90-day extension of the current dates set by the Court's October 11, 2022 Calendar Order. ECF 10. Specifically, the parties request the following modification:

	<u>Current Date</u>	<u>Requested Date</u>
Plaintiff Expert Disclosures	5/5/2023	8/4/2023
Defendant Expert Disclosures	6/16/2023	9/15/2023
Witness List & Summary Exchange	6/14/2023	9/14/2023
Discovery Deadline	7/14/2023	10/13/2023
Dispositive Motions	9/14/2023	12/14/2023
Final Pretrial Conf.	1/9/2024	April 2024
Jury Trial	2/12/2024	May 2024

The requested extension is made in the interest of efficiency, and not for the purpose of delay. The additional time will enable the parties to conduct necessary discovery, while also thoroughly engaging in good-faith settlement discussions.

Respectfully submitted,

/s/ Amy L. Wells
Amy L. Wells
Wells Law Office, Inc.
122 South Michigan Avenue, Suite 1390-145
Chicago, Illinois 60603-6036
Telephone: (773) 762-9104
Email: AmyWells@EqualJusticeLaw.com

Counsel for Plaintiff, Raphael P. Angeles

/s/ Esther Slater McDonald
Elizabeth Callan
eacallan@vorys.com
Vorys, Sater, Seymour and Pease LLP
301 East Fourth Street, Suite 3500
Cincinnati, Ohio 45202
Telephone: (513) 723-4016
Facsimile: (513) 723-4056

Frederick T. Smith*
fsmith@seyfarth.com
Esther Slater McDonald*
emcdonald@seyfarth.com
SEYFARTH SHAW LLP
1075 Peachtree Street, N.E., Suite 2500
Atlanta, Georgia 30309-3958
Telephone: (404) 885-1500
Facsimile: (404) 892-7056

*Attorneys for Defendant First Advantage
Background Services Corp.*

*Admitted *pro hac vice*

Date: May 5, 2023

Certificate of Service

I certify that the foregoing has been served by the Court's CM/ECF service to all counsel of record on May 5, 2023.

s/ Amy L. Wells

Amy L. Wells